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APPLICATION

1282-63224

Honorable James H. Welsh
Commissioner of Conservation
Louisiana Office of Conservation
P.O. Box 94275
Baton Rouge, Louisiana 70804

RE: 17,900' Tuscaloosa Sand, Reservoir A
18,800' Tuscaloosa Sand, Reservoir A
Morganza Field
Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **ENERGY PRODUCTION CORPORATION** for the calling of a public hearing, after thirty (30) days legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters in the **17,900' Tuscaloosa Sand, Reservoir A** and the **18,800' Tuscaloosa Sand, Reservoir A**, in the Morganza Field, Pointe Coupee Parish, Louisiana, to-wit:

1. To redefine the 17,900' Tuscaloosa Sand, Reservoir A, INsofar AND ONLY INsofar as Sand Units A, B, C, H, I and P are concerned, as that gas and condensate bearing interval encountered between the depths of 17,944 feet and 18,844 feet, electrical log measurements, in the BP America Production Co. - Dorothy Brown No. 2 Well, located in Section 56, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana;
2. Simultaneously with the redefinition of the 17,900' Tuscaloosa Sand, to establish rules and regulations and create six (6) drilling and production units for the exploration for and production of gas and condensate from the 18,800' Tuscaloosa Sand, such units to

be designated 18800 TUSC RA SUA, 18800 TUSC RA SUB, 18800 TUSC RA SUC, 18800 TUSC RA SUD, 18800 TUSC RA SUE, and 18800 TUSC RA SUF;

3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed units, with each tract sharing in unit production on a surface acreage basis of participation;
4. To designate the Energy Production Corp. - LaBarre Plantation Partnership 77 No. 1 Well as the unit well for the proposed 18800 TUSC RA SUC;
5. To designate Energy Production Corp. as the unit operator for 18800 TUSC RA SUC;
6. To provide that any wells drilled to the 18,800' Tuscaloosa Sand, Reservoir A should be located in accordance with the spacing provisions of Statewide Order 29-E;
7. To provide that the Commissioner of Conservation should be authorized to reclassify the 18,800' Sand, Reservoir A, by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation;
8. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The 17,900' Tuscaloosa Sand, Reservoir A, in the Morganza Field, Pointe Coupee Parish, Louisiana, was previously defined in Office of Conservation Order No. 1102, effective October 20, 1980, as amended by Order 1102-A, effective October 27, 1981, and Order 1102-A-10, effective September 19, 1995, and Order 1102-A-18, effective January 29, 2002.

The 17,900' Tuscaloosa Sand, Reservoir A, in the Morganza Field, is hereby redefined, INsofar AND ONLY INsofar as Sand Units A, B, C, H, I and P are concerned, as that certain gas and condensate bearing sand encountered between the depths of 17,944 feet and 18,844 feet, electrical log measurements, in the BP America Production Co. - Dorothy Brown No. 2 Well, located in Section 56, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana.

The 18,800' Tuscaloosa Sand in the Morganza Field, Pointe Coupee Parish, Louisiana, is hereby defined as that certain gas and condensate bearing sand encountered between the depths of 18,844 feet and 18,930 feet, electrical log measurements, in the BP America Production Co. - Dorothy Brown No. 2 Well, located in Section 56, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana, and is further defined as that certain gas and condensate bearing sand encountered between the depths of 18,770 feet and 18,860 feet, electrical log measurements, in the BP America Production Co. - F & L Planters No. 4 Well, located in Section 76, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana.

The proposed redefinition of the 17,900' Tuscaloosa Sand would simply raise the base of the current defined interval from 18,930 feet to 18,844 feet in the Dorothy Brown No. 2 Well, thereby removing the subsurface interval between 18,844 feet and 18,930 feet from the definition. As specified in numbered paragraph 1, under this proposal, the redefinition would only apply to Sand Units A, B, C, H, I and P. The subsurface interval which we propose to remove from the 17,900' Tuscaloosa Sand definition is the same interval which we are proposing be adopted as the 18,800' Tuscaloosa Sand. The exterior boundaries of the proposed 18,800' Tuscaloosa Sand units are identical to the exterior boundaries of the corresponding 17,900' Tuscaloosa Sand units covering the same geographic area.

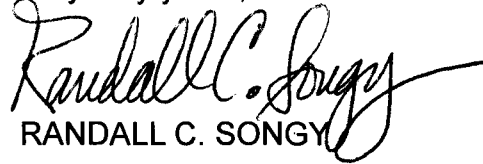
A conference to discuss the proposed application and any opposition thereto was held at 1:00 p.m. on December 21, 2004, at The Holiday Inn Select (formerly known as The Radisson), 4728 Constitution Avenue, Baton Rouge, LA (225)925-2244. Randall C. Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedures. Frank Harrison, Jr., geological consultant for the applicant, explained the applicant's proposal and the geological, engineering, and other bases therefor, and answered questions. No counterplans were presented and the conference was then adjourned.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **Frank Harrison, Jr., 200 Audubon Blvd., Lafayette, Louisiana 70503 (337)232-4031.**

There is attached hereto and made a part hereof plats outlining the proposed units and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$1,510.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,



RANDALL C. SONGY

RCS/elg/bad

Enclosures

cc: Mr. Richard Hudson, District Manager
Office of Conservation

All Interested Owners, Interested Parties and
Represented Parties

P.S. To all Interested Owners, Represented Parties and Interested Parties:

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed unit.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.

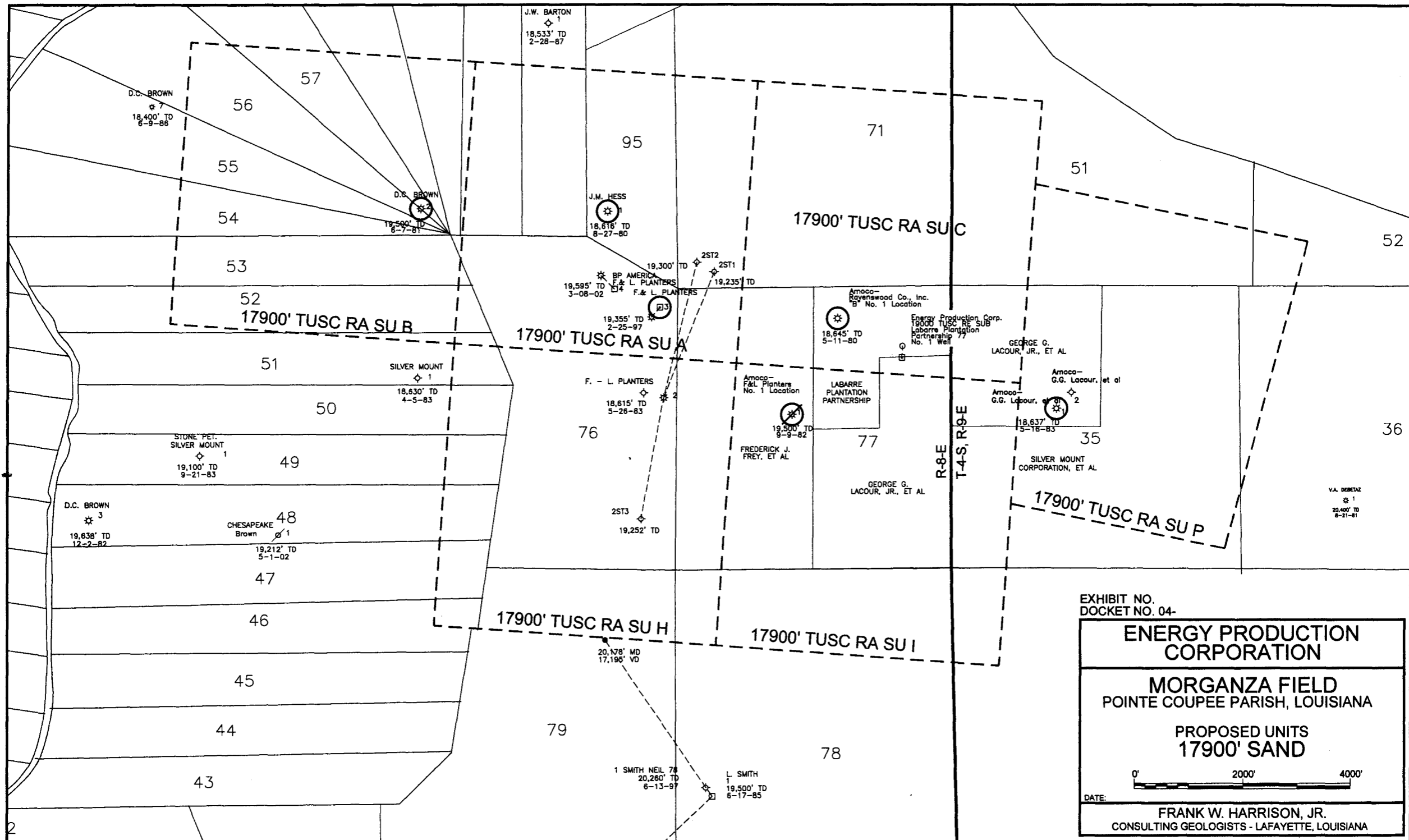


EXHIBIT NO.
DOCKET NO. 04-

**ENERGY PRODUCTION
CORPORATION**

**MORGANZA FIELD
POINTE COUPEE PARISH, LOUISIANA**

**PROPOSED UNITS
17900' SAND**

0' 2000' 4000'

DATE:

FRANK W. HARRISON, JR.
CONSULTING GEOLOGISTS - LAFAYETTE, LOUISIANA

